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June 7, 2021

VIA ECF

Honorable Mary K. Vyskocil
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Joval Palmer*, 20-CR-379 (MKV)

Dear Judge Vyskocil:

On August 31, 2020, I was appointed pursuant to the Criminal Justice Act ("CJA") to represent defendant Joval Palmer in connection to the above-captioned matter. Mr. Palmer pled guilty before Your Honor on April 29, 2021 to Hobbs Act robbery and possessing a firearm in relation to the robbery. He is scheduled to be sentenced on August 31, 2021. In anticipation of sentencing, and at Mr. Palmer's request, we respectfully write to request court approval to retain the services of a mitigation specialist.


Mr. Palmer, at age 33, has a unique background and history, as evidenced by our recently conducted pre-sentence interview. In light of the different factors that have played a part in Mr. Palmer's development and the commission of the offense, a mitigation specialist would help in assessing and diagnosing any and all particular issues that should be presented to the Court for sentencing. A mitigation specialist would also be able to craft a specific, proposed plan in regard to any rehabilitation efforts.

I have been on the Criminal Justice Panel for approximately 13 years and this is my first request of this kind. I have spoken to Mr. Palmer, who had conducted his own research on this issue and believes that a mitigation specialist is a valid request. In light of the time it will take to interview Mr. Palmer and draft any mitigation analysis, I respectfully request Court approval for CJA funds to cover a mitigation specialist at a reasonable and customary rate, and one who has previously conducted this type of work for the Panel.

Thank you for your consideration of this request.

Defendant's request is **DENIED WITHOUT PREJUDICE** for failure to explain why this case is unique and requires the services of a mitigation specialist in addition to counsel and for failure to provide any details on the rate and number of hours for which Defendant seeks approval. Defendant may refile his request with the herein described information. **SO ORDERED.**

Date: 6/8/2021
New York, New York


Mary Kay Vyskocil
United States District Judge

Respectfully submitted,

/s/
John Meringolo, Esq.